
UNITED STATES OF AMERICA)	
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)	MOTION FOR
v.)	DOCKETING
)	
)	
IBRAHIM AHMED MAHMOUD AL QOSI)	27 July 2004
)	

Part I - Request for Trial Date

1. The Prosecution will be prepared for trial and ready to begin its case on the merits on 10 January 2005.
2. The Prosecution estimates that it shall take approximately twelve (12) days to present its case on the merits, and one (1) day on sentencing if sentencing proceedings are required.
3. The Prosecution intends to furnish all information to the Defense, to include the names of witnesses that Commission Law requires, not later than 4 November 2004.
4. The Prosecution does intend to request that Protected Information be presented, and if the request is granted, that the presentation of such information shall take approximately two (2) days (such day already included in the calculation in paragraph 2 above.)
5. In determining a trial date, and on behalf of all counsel for the Prosecution in the above styled case, the Prosecution requests that the Presiding Officer consider the following events that would significantly interfere with counsels' being in trial:

<u>Counsel</u>	<u>Dates</u>	<u>Significant Event</u>
None		

6. Other information that may be of use to the Presiding Officer in the docketing of this case: None.

//Signed//

NAME REDACTED

Lieutenant Colonel, U. S. Marine Corps
Prosecutor

Revised: The names of prosecutors were redacted at the request of the Office of Military Commissions.

Part II - Defense Response to Docketing Request

1. The Defense (select one option below):

_____. Is prepared to begin its case on the merits after the conclusion of the Prosecution's case as indicated in Part I above.

_____. Requests that the trial begin on a date earlier than that requested by the Prosecution for the following reasons (be specific):

_____. Requests a delay in the beginning of the trial until _____ for the following reasons (be specific):

2. The Defense estimates that if it presents a case on the merits, it shall take approximately ____ days to present it. If sentencing proceedings are required, the defense will need ____ days to present it.

3. The Defense (does) (does not) intend to request that Protected Information be presented, [and if the request is granted, that the presentation of such information shall take approximately ____ days (such days already included in the calculation in paragraph 2 above.)]

4. The defense will not present any affirmative defenses as that term is used in Commission Law (See POM # 1 for a definition of that term.)

5. The defense will present, or may present, the following affirmative defense(s) as that term is used in Commission Law.

6. (Optional): In determining a trial date, and on behalf of all counsel for the Defense in the above styled case, the Defense requests that the Presiding Officer consider the following events that would significantly interfere with counsels' being in trial. (Include all counsel detailed to the case):

Counsel

Dates

Significant Event

7. (Optional.) Other information that may be of use to the Presiding Officer in the docketing of this case:

SHARON A. SHAFFER
Lieutenant Colonel, U.S. Air Force
Detailed Defense Counsel

Part III - Prosecution Reply to Docketing Request

1. The Prosecution (select one option below):

a. If the Defense requested a trial date earlier than that requested by the Prosecution.

_____ The Prosecution is prepared to proceed on the trial date requested by the Defense.

_____ The Prosecution is not prepared to proceed on the trial dated requested by the Defense for the following reasons (be specific):

b. If the defense requested a trial date later than that requested by the Prosecution.

_____ The Prosecution has no objection to the delay requested by the Defense.

_____ The Prosecution opposes to the delay requested by the defense because (be specific):

c. If the Prosecution and Defense both agreed to the same trial date, omit this paragraph.

2. (Optional.) Other information that may be of use to the Presiding Officer in the docketing of this case:

NAME REDACTED

Lieutenant Colonel, U. S. Marine Corps
Prosecutor

Part IV - Decision of the Presiding Officer

Revised: The names of prosecutors were redacted at the request of the Office of Military Commissions.